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DAIMLERCHRYSLER CORPORATION  
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7  
8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION  
10

11 CARLA CORTES, a minor, by and  
through her Guardian ad Litem, ISABEL  
12 CORTES GARCIA; ISABEL CORTES  
GARCIA; and JUAN CARLOS GARCIA  
13 TORRES,

14 Plaintiffs,

15 v.

16 DAIMLER CHRYSLER  
CORPORATION, and DOES ONE  
17 through ONE HUNDRED,

18 Defendants.  
19

CASE NO. C 05-01012 CRB

**STIPULATION AND PROPOSED ORDER  
RE INDEPENDENT MEDICAL  
EXAMINATION OF PLAINTIFF ISABEL  
CORTES GARCIA**

**[FRCP 35]**

20 The parties, through counsel, stipulate as follows:

21 1. Plaintiff ISABEL CORTES GARCIA will submit to an independent medical  
22 examination pursuant to Federal Rules of Civil Procedure Rule 35 on August 12, 2006 at 11:00  
23 a.m. with Dr. Jerold Kaplan, M.D. The IME will take place at Alta Bates Hospital located at  
24 2450 Ashby Avenue, Berkeley;

25 2. The IME will be noninvasive and will consist of a physical examination of  
26 plaintiff, a review of her medical records and an interview to obtain her medical history.

27 3. The IME is necessary as plaintiff's physical condition is in controversy in this  
28 action. Dr. Kaplan's C.V. is attached hereto as Exhibit "A."

1 DATED:

WALKUP, MELODIA, KELLY, WECHT &  
SCHOENBERGER

4 By:

5 Douglas S. Saeltzer

6 Attorneys for Plaintiffs CARLA CORTES, a minor, by  
7 and through her Guardian ad Litem, ISABEL CORTES  
8 GARCIA and JUAN CARLOS GARCIA

9 DATED:

8/3/06

10 SEDGWICK, DETERT, MORAN & ARNOLD LLP

11 By:

12 Dennis E. Raglin

13 Attorneys for Defendant  
14 DAIMLERCHRYSLER CORPORATION

15 **ORDER**

16 Based on the stipulation between the parties, IT IS HEREBY ORDERED that plaintiff  
17 ISABEL CORTES GARCIA will submit to an independent medical examination pursuant to  
18 Federal Rules of Civil Procedure, Rule 35, as set forth above.  
19

20 DATED: August 7, 2006

21 Hon. Charles Breyer  
22 United States District Court

